

EXHIBIT E

McQueen, Allison L.

From: Matthews, Jordan M.
Sent: Friday, June 7, 2024 11:01 AM
To: Gabrielle Vinci
Cc: Biesenthal, Bethany K.; McQueen, Allison L.; Hart, Robert F.; Lee, Andrew; Lanchantin, Holly; Jordan Tuchman; Andrew T. Miltenberg; Kara Gorycki; damon@cheronislaw.com
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Gabrielle,

Two weeks have now passed with no response to the emails we sent on May 20 and May 24. And, apart from the small production we received on Wednesday, June 5 (PLTF001587-001703), the issues laid out in detail in our deficiency letters and the emails below have not been remedied.

We would like to schedule one final meet and confer in the hopes of moving discovery forward before involving the Court. Please let us know if you are available in one of these windows next week:

- Monday, June 10: 10:30–2:00 p.m. CT
- Tuesday, June 11: 10:00–12:00 p.m. CT or any time after 1:30 p.m. CT

Best,
Jordan

Jordan M. Matthews ([bio](#))
Partner
[JONES DAY® - One Firm Worldwide®](#)
110 N. Wacker Dr., Suite 4800
Chicago, Illinois 60606
Office [312.269.4169](tel:312.269.4169)
jmatthews@jonesday.com

From: McQueen, Allison L. <amcqueen@jonesday.com>
Sent: Friday, May 24, 2024 2:08 PM
To: Gabrielle Vinci <GVinci@nmllplaw.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmllplaw.com>; Andrew T. Miltenberg <AMiltenberg@nmllplaw.com>; Kara Gorycki <KGorycki@nmllplaw.com>; damon@cheronislaw.com
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Gabrielle,

Thank you for providing Plaintiff's Second Amended Interrogatory Responses and first ESI production earlier in the week.

There are two outstanding issues with Plaintiff's Interrogatory Responses that we wanted to bring to your attention:

- In the Second Amended Interrogatory Responses we received on Tuesday, May 21, Plaintiff failed to confirm that she is not withholding any information on the basis of her objections or a claim of privilege in her response to Interrogatory No. 8.

- Also in response to Interrogatory No. 8, Plaintiff lumped Elizabeth Pardoe in with her description of information she shared with former members of the Spirit Squad. Ms. Pardoe is a Northwestern University professor. Please provide a separate description of the information Plaintiff provided to Ms. Pardoe regarding “any alleged inappropriate touching, exploitation, or verbal harassment that Plaintiff experienced while a member of the Spirit Squad.

We are hoping that both of these outstanding issues will be a quick fix. Please let us know when we can expect to receive an amended response to Interrogatory No. 8.

With respect to our outstanding document requests, it appears that a significant number of screenshots were included in your May 21 production (to identify just a few, PLTF000888 and PLTF000898–000910). We are also missing various emails in each chain and the attachments to emails. In fact, when we uploaded Plaintiff’s production to Relativity, there was not a single document in the production that was part of a family. Could you describe the process you used for the collection of Plaintiff’s ESI, please? Plaintiff needs to collect—and produce—native files rather than cherry-picking portions of email conversations for production.

In addition to clarifying Plaintiff’s collection process and letting us know when these materials will be re-produced, please let us know when we can expect the following (as requested in the May 20 email below):

1. Plaintiff’s next rolling ESI production;
2. The date on which you anticipate all of Plaintiff’s ESI will be produced;
3. Hard copy documents that are responsive to Polisky’s requests for production, particularly Request Nos. 4–5, 8, 13–15, 17–18, 22, 25, 29–32, 35–41, 43–47, and 49;
4. Written confirmation that Plaintiff is not withholding any documents based on her objections and claims of privilege; and
5. Amended responses to Polisky’s requests for production confirming that all responsive documents have been produced or, alternatively, that there are no documents responsive to a particular request.

We would prefer to resolve these outstanding deficiencies without court intervention but, as I hope you can appreciate, the continued delays are bringing us ever closer to the fact discovery deadlines (particularly the deadline to schedule depositions). Next Friday, May 31, will be exactly seven months since Plaintiff received our discovery requests. If we are still waiting for a substantial portion of Plaintiff’s production on that date—both properly-produced ESI and the hard copy documents we’ve requested—we will have no choice but to file a motion to compel.

Best,
Ally

Allison (Ally) McQueen
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110 North Wacker Drive
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Office +1.312.269.1541
amcqueen@jonesday.com

From: McQueen, Allison L.

Sent: Monday, May 20, 2024 7:40 PM

To: Gabrielle Vinci <GVinci@nmlplaw.com>

Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Hart,

Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmlplaw.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Gabrielle,

Thank you for updating us on the timing of Plaintiff's second amended interrogatory responses and initial ESI production.

Please let us know when we can expect to receive the other items laid out in our March 7 and May 3 deficiency letters (and discussed during our call last Monday), namely:

- (1) Written confirmation that Plaintiff is not withholding any responsive information or documents based on her objections and claims of privilege;
- (2) Hard copy documents that are responsive to Polisky's requests for production, particularly Request Nos. 4–5, 8, 13–15, 17–18, 22, 25, 29–32, 35–41, 43–47, and 49; and
- (3) Amended responses to Polisky's requests for production confirming that all responsive documents have been produced or, alternatively, that there are no documents responsive to a particular request.

Also, thank you for updating us on Plaintiff's availability for her deposition. We will discuss available dates in mid- to late-July with our co-defendants and revert back.

Best,
Ally

Allison (Ally) McQueen
Associate
[JONES DAY® - One Firm WorldwideSM](#)
110 North Wacker Drive
Chicago, IL 60606
Office +1.312.269.1541
amcqueen@jonesday.com

From: Gabrielle Vinci <GVinci@nmlplaw.com>

Sent: Monday, May 20, 2024 6:28 PM

To: McQueen, Allison L. <amcqueen@jonesday.com>

Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmlplaw.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com

Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

This Message Is From an External Sender

If you are concerned about the message's content, highlight the email in your inbox and click "Report Suspicious" in the Outlook ribbon -or- contact 6Help.

Good afternoon, Allison,

I just connected with my team at the office after being in CT for a hearing. They advised that the anticipated production was not finalized by end of day but will be prepared to be served tomorrow. I am back in the office tomorrow and will personally see that the responses and first ESI production are sent out. I also anticipate a second ESI production in the latter half of the week.

Thank you,
Gabrielle



Gabrielle Vinci, Partner

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From: Gabrielle Vinci <GVinci@nmllplaw.com>

Sent: Friday, May 17, 2024 3:28 PM

To: McQueen, Allison L. <amcqueen@jonesday.com>

Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmllplaw.com>; Andrew T. Miltenberg <AMiltenberg@nmllplaw.com>; Kara Gorycki <KGorycki@nmllplaw.com>; damon@cheronislaw.com

Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Good afternoon, Allison,

Thank you for the call earlier this week. As a follow-up, I wanted to advise that I am in the process of finalizing the amended discovery responses with Plaintiff and for her to verify them. I expect to serve them on Monday. In addition, I have confirmed with our ESI team that they will be ready to prepare and begin rolling production of ESI on Monday as I had anticipated.

In addition, I spoke with Ms. Richardson regarding her deposition and she has advised that she has open availability during the target timeframe (mid-late July) for her deposition.

I will let you know if there are any changes to the above schedule though I do not anticipate any. Thank you and have a good weekend.

Best,
Gabrielle



Gabrielle Vinci, Partner

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From: McQueen, Allison L. <amcqueen@jonesday.com>

Sent: Thursday, May 9, 2024 12:18 PM

To: Gabrielle Vinci <GVinci@nmllplaw.com>

Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmllplaw.com>; Andrew T. Miltenberg <AMiltenberg@nmllplaw.com>; Kara Gorycki <KGorycki@nmllplaw.com>; damon@cheronislaw.com

Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

I'll send an updated invite for Monday at 11:00 ET.

Allison (Ally) McQueen
Associate

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amcqueen@jonesday.com

From: Gabrielle Vinci <GVinci@nmllplaw.com>

Sent: Thursday, May 9, 2024 11:08 AM

To: McQueen, Allison L. <amcqueen@jonesday.com>

Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmllplaw.com>; Andrew T. Miltenberg <AMiltenberg@nmllplaw.com>; Kara Gorycki <KGorycki@nmllplaw.com>; damon@cheronislaw.com

Subject: Re: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

I have open availability on both days between 11-12:30 and then again from 2:00-6:00.



Gabrielle Vinci, Partner

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On May 9, 2024, at 9:50 AM, McQueen, Allison L. <amcqueen@jonesday.com> wrote:

Please let us know when you are available on Monday and Tuesday.

Allison (Ally) McQueen
Associate
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110 North Wacker Drive
Chicago, IL 60606
Office +1.312.269.1541
amcqueen@jonesday.com

From: Gabrielle Vinci <GVinci@nmllplaw.com>
Date: Thursday, May 09, 2024 at 8:33 AM
To: McQueen, Allison L. <amcqueen@jonesday.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>, Biesenthal, Bethany K. <bbiesenthal@jonesday.com>, Hart, Robert F. <rhart@jonesday.com>, Lee, Andrew <andrewlee@jonesday.com>, Lanchantin, Holly <hlanchantin@jonesday.com>, Jordan Tuchman <jtuchman@nmllplaw.com>, Andrew T. Miltenberg <AMiltenberg@nmllplaw.com>, Kara Gorycki <KGorycki@nmllplaw.com>, damon@cheronislaw.com <damon@cheronislaw.com>
Subject: Re: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Allison. I have to cover a court appearance this afternoon and need to move our call. I am available tomorrow between noon and 5pm EST. Please let me know if any time in that block works otherwise I will send some times for Monday and Tuesday. Thanks.

[<nmllpnewyork-boston-paloaltologosignature6-30_86761340-f12a-4199-a5e2-ef3472a044a9.jpg>](#)

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On May 6, 2024, at 12:03 PM, McQueen, Allison L. <amcqueen@jonesday.com> wrote:

Hi Gabrielle,

Thank you for the update. I will send an invite for Thursday at 2:30 p.m. ET.

Best,

Ally

Allison (Ally) McQueen

Associate

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amcqueen@jonesday.com

From: Gabrielle Vinci <GVinci@nmllplaw.com>

Sent: Monday, May 6, 2024 10:48 AM

To: McQueen, Allison L. <amcqueen@jonesday.com>

Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmllplaw.com>; Andrew T. Miltenberg <AMiltenberg@nmllplaw.com>; Kara Gorycki <KGorycki@nmllplaw.com>; damon@cheronislaw.com

Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Good afternoon, Allison,

I have spoken to our ESI team and Plaintiff regarding the supplemental production. The ESI team advised that the issues with the initial collection have been addressed and expect to produce document for my review before production

this week. I expect to be able to begin rolling production and any amended/supplemental responses by early-mid next week.

With respect to a meet and confer, I am available any time between 2:30-4pm EST on Thursday, May 9th. Feel free to send a calendar invite for a convenient time for you.

Thank you,
Gabrielle

<image001.jpg>

Gabrielle Vinci, Partner

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From: McQueen, Allison L. <amcqueen@jonesday.com>
Sent: Friday, May 3, 2024 5:11 PM
To: Gabrielle Vinci <GVinci@nmllplaw.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmllplaw.com>; Andrew T. Miltenberg <AMiltenberg@nmllplaw.com>; Kara Gorycki <KGorycki@nmllplaw.com>; damon@cheronislaw.com
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Gabrielle,

A letter laying out the outstanding deficiencies in Plaintiff's responses to Defendant Polisky's First Set of Interrogatories and First Requests for Production of Documents is attached.

As stated in the letter, please let us know by Monday, May 6 when we can expect to receive Plaintiff's supplemental productions. In addition, please let us know if any of the following dates/times next week would work with your schedule for a meet and confer:

- Tuesday, May 7: 11:15–12:00 p.m. ET
- Thursday, May 9: 11:00–12:45 p.m. or 2:00–4:00 p.m. ET

Have a nice weekend,
Ally

Allison (Ally) McQueen
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amcqueen@jonesday.com

From: McQueen, Allison L.
Sent: Monday, April 29, 2024 8:23 PM
To: Gabrielle Vinci <GVinci@nmlplaw.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmlplaw.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Gabrielle,

I hope your week is off to a good start.

When you have a chance, could you let us know when we can expect to receive additional supplemental productions from Plaintiff? Based on the cover letters you have provided, it looks like we have only received documents responsive to Request for Production Nos. 43–45. We understand there have been some delays with your ESI provider, but we would appreciate an update on the documents responsive to the non-ESI Requests flagged in our March 7, 2024 letter (namely, Request for Production Nos. 4, 5, 8, 13, 14, 15, 17, 18, 22, 25, 29, 30, 31, 35, 36–41, 46, 47, 49).

Best,
Ally

Allison (Ally) McQueen
Associate
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amcqueen@jonesday.com

From: Hart, Robert F. <rhart@jonesday.com>
Sent: Tuesday, April 9, 2024 7:46 AM
To: Gabrielle Vinci <GVinci@nmlplaw.com>
Cc: McQueen, Allison L. <amcqueen@jonesday.com>; Jordan Tuchman <jtuchman@nmlplaw.com>; Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly

<hlanchantin@jonesday.com>

Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Great – thank you so much.

From: Gabrielle Vinci <GVinci@nmlplaw.com>

Sent: Tuesday, April 9, 2024 7:44 AM

To: Hart, Robert F. <rhart@jonesday.com>

Cc: McQueen, Allison L. <amcqueen@jonesday.com>; Jordan Tuchman <jtuchman@nmlplaw.com>; Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>

Subject: Re: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Good morning, Robert. They will begin coming through this morning. Thank you.

<image001.jpg>

Gabrielle Vinci, Partner

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On Apr 9, 2024, at 8:33 AM, Hart, Robert F. <rhart@jonesday.com> wrote:

Gabrielle –

I hope you had a nice weekend. It's my understanding that Plaintiff was going to begin serving supplemental responses yesterday – please let us know when we can expect to receive them.

Thanks,
Rob

From: McQueen, Allison L. <amcqueen@jonesday.com>

Sent: Monday, April 1, 2024 1:19 PM

To: Jordan Tuchman <jtuchman@nmlplaw.com>; Gabrielle Vinci <GVinci@nmlplaw.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

That works. I will send a Teams invite to you and Gabrielle. Let me know if there is anyone you would like me to include from your team.

Allison (Ally) McQueen
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From: Jordan Tuchman <jtuchman@nmlplaw.com>
Sent: Monday, April 1, 2024 1:06 PM
To: McQueen, Allison L. <amcqueen@jonesday.com>; Gabrielle Vinci <GVinci@nmlplaw.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>
Subject: Re: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Ally,

How is 10AM EST?

Best,
Jordan

<image001.jpg>

Jordan Tuchman

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New York, NY 10001-3904
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From: McQueen, Allison L. <amcqueen@jonesday.com>
Sent: Monday, April 1, 2024 1:35 PM
To: Jordan Tuchman <jtuchman@nmlplaw.com>; Gabrielle Vinci <GVinci@nmlplaw.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com <damon@cheronislaw.com>; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Jordan,

We're open before 1:00 p.m. CT tomorrow. Please let us know if there is a time in that window that would work for your team.

Best,
Ally

Allison (Ally) McQueen
Associate
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amcqueen@jonesday.com

From: Jordan Tuchman <jtuchman@nmlplaw.com>
Sent: Monday, April 1, 2024 10:52 AM
To: McQueen, Allison L. <amcqueen@jonesday.com>; Gabrielle Vinci <GVinci@nmlplaw.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Allison,

Gabrielle is stuck in court today. Can you please provide us with your availability tomorrow?

Best,
Jordan

<image001.jpg>

Jordan Tuchman

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From: McQueen, Allison L. <amcqueen@jonesday.com>
Sent: Friday, March 29, 2024 2:56 PM
To: Gabrielle Vinci <GVinci@nmlplaw.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmlplaw.com>
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Please let us know if you are available on Monday after 3:30 ET. If that window doesn't work I can propose additional times later in the week.

Allison (Ally) McQueen
Associate
[JONES DAY® - One Firm WorldwideSM](#)
110 North Wacker Drive
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amcqueen@jonesday.com

From: Gabrielle Vinci <GVinci@nmlplaw.com>
Sent: Friday, March 29, 2024 12:23 PM
To: McQueen, Allison L. <amcqueen@jonesday.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg

<AMiltenberg@nmlplaw.com>; Kara Gorycki
<KGorycki@nmlplaw.com>; damon@cheronislaw.com; Hart, Robert F.
<rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>;
Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman
<jtuchman@nmlplaw.com>
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery
Responses for Amanda DaSilva

Hi Allison,

I need to move our call as Ms. Tuchman has to leave early for a medical appointment and I need her on the call as she has been involved in the review and response of the deficiency notice. Are you available early next week?

As an aside, I spoke with my client yesterday and we should be producing supplemental/amended responses which address a number of the items in your letter early next week as well.

Thank you,
Gabrielle

<image001.jpg>

Gabrielle Vinci, Partner

363 Seventh Avenue, 5th Floor
New York, NY 10001-3904
212.736.4500 • 212.736.2260 fax
Vcard • nmlplaw.com

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From: McQueen, Allison L. <amcqueen@jonesday.com>
Sent: Friday, March 22, 2024 12:45 PM
To: Gabrielle Vinci <GVinci@nmlplaw.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmlplaw.com>
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Gabrielle,

I hope you are feeling better!

If you or another member of your team have time next week we would greatly appreciate the chance to discuss the deficiency letter we sent on March 7. Please let us know if a time in one of these windows would work on your end:

1. Monday, March 25: Any time after 3:00 p.m. ET
2. Friday, March 29: 12:30 p.m.–2:00 p.m. ET or any time after 2:30 p.m. ET

If another day next week would be more convenient please let us know.

Best,
Ally

Allison (Ally) McQueen
Associate
[JONES DAY® - One Firm WorldwideSM](#)
110 North Wacker Drive
Chicago, IL 60606
Office +1.312.269.1541
amcqueen@jonesday.com

From: McQueen, Allison L.
Sent: Monday, March 18, 2024 2:34 PM
To: Gabrielle Vinci <GVinci@nmlplaw.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmlplaw.com>
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Gabrielle,

Thank you for letting us know. I hope you're feeling ok.

Could we get some time on the calendar later in the week to discuss, please? Here are some times our team is available:

1. Wednesday, March 20: 3:00–4:30 p.m. ET
2. Thursday, March 21: 12:30–3:00 p.m. or 4:00–4:30 p.m. ET

Best,
Ally

Allison (Ally) McQueen
Associate
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110 North Wacker Drive
Chicago, IL 60606
Office +1.312.269.1541
amcqueen@jonesday.com

From: Gabrielle Vinci <GVinci@nmlplaw.com>
Sent: Monday, March 18, 2024 2:18 PM
To: McQueen, Allison L. <amcqueen@jonesday.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmlplaw.com>
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Allison,

I have to move our call this morning. I truly do apologize but I am unexpectedly still at a doctor appointment (candidly, I am experiencing some pregnancy complications that my care team is trying to figure out and have been back and forth over the past few weeks).

To move things along, I have had my colleague who is joining the case review and also draft a written response to your deficiency notice. I will have her (or if I am back I shall) send that to you this week so we can perhaps have a more productive meet and confer after your review.

Thank you again for your continued understanding.

Gabrielle

<image001.jpg>

Gabrielle Vinci, Partner

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New York, NY 10001-3904
212.736.4500 • 212.736.2260 fax
Vcard • nmlplaw.com

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From: McQueen, Allison L. <amcqueen@jonesday.com>
Sent: Thursday, March 14, 2024 10:27 AM
To: Gabrielle Vinci <GVinci@nmlplaw.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmlplaw.com>
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Thanks, Gabrielle. We will give you a call on Monday.

Allison (Ally) McQueen
Associate
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110 North Wacker Drive
Chicago, IL 60606
Office +1.312.269.1541
amcqueen@jonesday.com

From: Gabrielle Vinci <GVinci@nmlplaw.com>
Sent: Thursday, March 14, 2024 7:13 AM
To: McQueen, Allison L. <amcqueen@jonesday.com>
Cc: Matthews, Jordan M. <jmatthews@jonesday.com>; Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; Andrew T. Miltenberg <AMiltenberg@nmlplaw.com>; Kara Gorycki <KGorycki@nmlplaw.com>; damon@cheronislaw.com; Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew <andrewlee@jonesday.com>; Lanchantin, Holly <hlanchantin@jonesday.com>; Jordan Tuchman <jtuchman@nmlplaw.com>
Subject: Re: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Allison,
Monday at 4:30 will work for me

<image001.jpg>

Gabrielle Vinci, Partner

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New York, NY 10001-3904
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Vcard • nmlplaw.com

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On Mar 13, 2024, at 5:04 PM, McQueen, Allison L.
<amcqueen@jonesday.com> wrote:

Hi Gabrielle,

Guessing you got tied up—could we reschedule for Monday, March 18, please? Here are times our team is available:

1. 11:30 a.m.–2:30 p.m. ET
2. After 4:00 p.m. ET

Best,
Ally

Allison (Ally) McQueen
Associate
[JONES DAY® - One Firm WorldwideSM](#)
110 North Wacker Drive
Chicago, IL 60606
Office +1.312.269.1541
amcqueen@jonesday.com

From: Matthews, Jordan M.
<jmatthews@jonesday.com>
Sent: Wednesday, March 13, 2024 10:10 AM
To: Gabrielle Vinci <GVinci@nmlplaw.com>; McQueen, Allison L. <amcqueen@jonesday.com>
Cc: Biesenthal, Bethany K.
<bbiesenthal@jonesday.com>; Andrew T. Miltenberg
<AMiltenberg@nmlplaw.com>; Kara Gorycki
<KGorycki@nmlplaw.com>; damon@cheronislaw.com;
Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew
<andrewlee@jonesday.com>; Lanchantin, Holly
<hlanchantin@jonesday.com>; Jordan Tuchman
<jtuchman@nmlplaw.com>
Subject: RE: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Gabrielle –

Any chance we can reschedule for later this afternoon? My schedule is relatively open today.

Thanks,
Jordan

Jordan M. Matthews ([bio](#))
Partner
[JONES DAY® - One Firm Worldwide®](#)
110 N. Wacker Dr., Suite 4800
Chicago, Illinois 60606
Office [312.269.4169](#)
jmatthews@jonesday.com

From: Gabrielle Vinci <GVinci@nmlplaw.com>
Sent: Wednesday, March 13, 2024 9:48 AM
To: McQueen, Allison L. <amcqueen@jonesday.com>
Cc: Biesenthal, Bethany K.
<bbiesenthal@jonesday.com>; Matthews, Jordan M.
<jmatthews@jonesday.com>; Andrew T. Miltenberg
<AMiltenberg@nmlplaw.com>; Kara Gorycki
<KGorycki@nmlplaw.com>; damon@cheronislaw.com;
Hart, Robert F. <rhart@jonesday.com>; Lee, Andrew
<andrewlee@jonesday.com>; Lanchantin, Holly
<hlanchantin@jonesday.com>; Jordan Tuchman
<jtuchman@nmlplaw.com>
Subject: Re: Richardson v. Northwestern University, et al. -- Discovery Responses for Amanda DaSilva

Hi Ally. I am stuck in court and need to move our call.
Are you available any time on Friday or Mon and
Tuesday next week?

If not, let me know what time on Wednesday works as
my associate, Jordan Tuchman, may be able to handle
the call. Thanks.

<image001.jpg>

Gabrielle Vinci, Partner

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On Mar 12, 2024, at 2:32 PM, Gabrielle
Vinci <GVinci@nmlplaw.com> wrote:

Hi Ally,

Tomorrow at 11:30 ET works for me. Please reach me at my office or let me know if you'd like me to send a conference number. Thank you.

nmlplawnewyork-boston-paloaltologosignature6-30_86761340-f12a-4199-a5e2-ef3472a044a9.jpg

Gabrielle Vinci, Partner

363 Seventh Avenue, 5th Floor
New York, NY 10001-3904
212.736.4500 • 212.736.2260 fax
Vcard • nmlplaw.com

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents.

From: McQueen, Allison L.
<amcqueen@jonesday.com>
Sent: Tuesday, March 12, 2024 2:27 PM
To: Gabrielle Vinci
<GVinci@nmlplaw.com>
Cc: Biesenthal, Bethany K.
<bbiesenthal@jonesday.com>;
Matthews, Jordan M.
<jmatthews@jonesday.com>; Andrew
T. Miltenberg
<AMiltenberg@nmlplaw.com>; Kara
Gorycki <KGorycki@nmlplaw.com>;
damon@cheronislaw.com; Hart, Robert
F. <rhart@jonesday.com>; Lee, Andrew
<andrewlee@jonesday.com>;
Lanchantin, Holly
<hlanchantin@jonesday.com>
Subject: RE: Richardson v.
Northwestern University, et al. --

Discovery Responses for Amanda
DaSilva

Hi Gabrielle,

Following up on my email last week,
could we set up a time to discuss
Plaintiff's discovery responses? Jordan
and I are still available at the times I
proposed for tomorrow. We will also
be open next Wednesday, March 20
before 11:30 a.m. ET.

Best,
Ally

Allison (Ally) McQueen
Associate
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110 North Wacker Drive
Chicago, IL 60606
Office +1.312.269.1541
amcqueen@jonesday.com

From: McQueen, Allison L.
Sent: Thursday, March 7, 2024 1:10 PM
To: Gabrielle Vinci
<GVinci@nmlplaw.com>
Cc: Biesenthal, Bethany K.
<bbiesenthal@jonesday.com>;
Matthews, Jordan M.
<jmatthews@jonesday.com>;
amiltenberg@nmlplaw.com;
KGorycki@nmlplaw.com;
damon@cheronislaw.com; Hart, Robert
F. <rhart@jonesday.com>; Lee, Andrew
<andrewlee@jonesday.com>;
Lanchantin, Holly
<hlanchantin@jonesday.com>
Subject: RE: Richardson v.
Northwestern University, et al. --
Discovery Responses for Amanda
DaSilva

Hi Gabrielle,

I hope you're doing well.

A letter laying out deficiencies in
Plaintiff's responses to Defendant
Polisky's initial discovery requests is
attached. If you have time next week
we would appreciate a call to discuss

this letter with you. Here are some dates and times our team will be available:

1. Tuesday, March 12: 10:30–11:30 a.m., 1:00–2:00 p.m., or after 4:30 p.m. ET
2. Wednesday, March 13: 11:30–12:00 p.m., 2:00–2:30 p.m., 3:30–4:00 p.m., or after 4:30 p.m. ET

Let us know if there is a time in one of those windows that would work well with your schedule.

Best,
Ally

Allison (Ally) McQueen
Associate
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110 North Wacker Drive
Chicago, IL 60606
Office +1.312.269.1541
amcqueen@jonesday.com

From: Gabrielle Vinci
<GVinci@nmlplaw.com>
Sent: Friday, February 9, 2024 9:00 AM
To: McQueen, Allison L.
<amcqueen@jonesday.com>;
jamel.greer@akerman.com;
ckendall@chapmanspingola.com;
Andrew T. Miltenberg
<AMiltenberg@nmlplaw.com>; Kara
Gorycki <KGorycki@nmlplaw.com>;
rlevitt@beneschlaw.com;
damon@cheronislaw.com;
amy.doehring@akerman.com;
lakeisha.marsh@akerman.com;
kmhaase@michaelbest.com;
andrew.shelby@michaelbest.com;
BPPaul@michaelbest.com;
mkchropowicz@michaelbest.com;
Biesenthal, Bethany K.
<bbiesenthal@jonesday.com>;
Matthews, Jordan M.
<jmatthews@jonesday.com>;
awermuth@cozen.com
Subject: RE: Richardson v.
Northwestern University, et al. --
Discovery Responses for Amanda
DaSilva

All-

Attached please find Plaintiff's Responses and Objections to Defendant Polisky's First Set of Interrogatories. Plaintiff's responses to Defendant Polisky's First Requests for Production shall follow shortly.

Thank you,

<image001.jpg>

Gabrielle Vinci, Partner

363 Seventh Avenue, 5th Floor
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Vcard • nmlplaw.com

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From: McQueen, Allison L.
<amcqueen@jonesday.com>
Sent: Thursday, February 8, 2024 7:50 PM
To: jamel.greer@akerman.com;
ckendall@chapmanspingola.com;
Andrew T. Miltenberg
<AMiltenberg@nmlplaw.com>; Kara
Gorycki <KGorycki@nmlplaw.com>;
Gabrielle Vinci
<GVinci@nmlplaw.com>;
rlevitt@beneschlaw.com;
damon@cheronislaw.com;
amy.doehring@akerman.com;
lakeisha.marsh@akerman.com;
kmhaase@michaelbest.com;
andrew.shelby@michaelbest.com;
BPPaul@michaelbest.com;

mkchropowicz@michaelbest.com;

Biesenthal, Bethany K.

<bbiesenthal@jonesday.com>;

Matthews, Jordan M.

<jmatthews@jonesday.com>;

awermuth@cozen.com

Subject: RE: Richardson v.

Northwestern University, et al. --

Discovery Responses for Amanda

DaSilva

Counsel,

Defendant Mike Polisky's responses to
Plaintiff's first set of discovery requests
are attached.

Best,

Ally

Allison (Ally) McQueen

Associate

[JONES DAY® - One Firm WorldwideSM](#)

110 North Wacker Drive

Chicago, IL 60606

Office +1.312.269.1541

amcqueen@jonesday.com

From: jamel.greer@akerman.com

<jamel.greer@akerman.com>

Sent: Thursday, February 8, 2024 5:51
PM

To: ckendall@chapmanspingola.com;

AMiltenberg@nmlplaw.com;

KGorycki@nmlplaw.com;

GVinci@nmlplaw.com;

rlevitt@beneschlaw.com;

damon@cheronislaw.com;

amy.doehring@akerman.com;

lakeisha.marsh@akerman.com;

kmhaase@michaelbest.com;

andrew.shelby@michaelbest.com;

BPPaul@michaelbest.com;

mkchropowicz@michaelbest.com;

Biesenthal, Bethany K.

<bbiesenthal@jonesday.com>;

Matthews, Jordan M.

<jmatthews@jonesday.com>;

McQueen, Allison L.

<amcqueen@jonesday.com>;

awermuth@cozen.com

Subject: RE: Richardson v.

Northwestern University, et al. --

Discovery Responses for Amanda
DaSilva

All,

Please see the attached responses to
plaintiff's first set of discovery requests
on behalf of Amanda DaSilva.

Best,
Jamel

Jamel A.R. Greer

(He/Him/His)

Akerman LLP | 601 West Fifth Street, Suite
300 | Los Angeles, CA 90071

Akerman LLP | 71 South Wacker Drive, 47th
Floor | Chicago, IL 60606

D: 213 533 5929 | T: 213 688 9500 | F: 213
627 6342

Admitted Only in California and Illinois

jamel.greer@akerman.com

[vCard](#) | [Profile](#)

<image002.jpg>

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immediately reply to the sender that you have
received this communication in error and then delete
it. Thank you.

From: Christopher Kendall

[<ckendall@chapmanspingola.com>](mailto:ckendall@chapmanspingola.com)

Sent: Thursday, February 8, 2024 3:35
PM

To: Andrew T. Miltenberg

[<AMiltenberg@nmlplaw.com>](mailto:AMiltenberg@nmlplaw.com); Kara
Gorycki [<KGorycki@nmlplaw.com>](mailto:KGorycki@nmlplaw.com);

Gabrielle Vinci

[<GVinci@nmlplaw.com>](mailto:GVinci@nmlplaw.com);

rlevitt@beneschlaw.com; Damon

Cheronis [<damon@cheronislaw.com>](mailto:damon@cheronislaw.com);

Doehring, Amy (Ptnr-Chi)

[<amy.doehring@akerman.com>](mailto:amy.doehring@akerman.com); Greer,

Jamel (Assoc-Lax)

[<jamel.greer@akerman.com>](mailto:jamel.greer@akerman.com); Marsh,

LaKeisha (Ptnr-Chi)
<lakeisha.marsh@akerman.com>;
kmhaase@michaelbest.com;
andrew.shelby@michaelbest.com;
bppaul@michaelbest.com;
mkchropowicz@michaelbest.com;
Biesenthal, Bethany K.
<bbiesenthal@jonesday.com>;
jmatthews@jonesday.com;
amcqueen@jonesday.com; Wermuth,
Anna <awermuth@cozen.com>
Subject: Richardson v. Northwestern
University, et al. -- Discovery Responses
for Pam Bonnevier

[External to Akerman]

Counsel:

I have attached Pam Bonnevier's
responses to Plaintiff's discovery
requests.

Chris

Christopher C. Kendall
Of Counsel
190 South LaSalle Street, Suite 3850
Chicago, IL 60603
Cell | 312-493-5274
Phone | 312 606-8642
Fax | 312 630-9233
<image003.jpg>
| [Website](#) |

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error, please resend this communication to
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or any copy of it from your computer
system. Thank you.

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privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.***

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This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.